

STATE OF CONNECTICUT  
CONNECTICUT SITING COUNCIL

NORTHEAST UTILITIES SERVICE  
COMPANY APPLICATION TO THE  
CONNECTICUT SITING COUNCIL  
FOR A CERTIFICATE OF  
ENVIRONMENTAL COMPATIBILITY  
AND PUBLIC NEED ("CERTIFICATE")  
FOR THE CONSTRUCTION OF A  
NEW 345-KV ELECTRIC TRANSMISSION  
LINE FACILITY AND ASSOCIATED  
FACILITIES BETWEEN SCOVILL  
ROCK SWITCHING STATION IN  
MIDDLETOWN AND NORWALK  
SUBSTATION IN NORWALK, INCLUDING  
THE RECONSTRUCTION OF PORTIONS  
OF EXISTING 115-KV AND 345-KV  
ELECTRIC TRANSMISSION LINES,  
THE CONSTRUCTION OF BESECK  
SWITCHING STATION IN  
WALLINGFORD, EAST DEVON  
SUBSTATION IN MILFORD, AND  
SINGER SUBSTATION IN BRIDGEPORT,  
MODIFICATIONS AT SCOVILL ROCK  
SWITCHING STATION AND NORWALK  
SUBSTATION, AND THE  
RECONFIGURATION OF CERTAIN  
INTERCONNECTIONS

DOCKET NO. 272

APRIL 2, 2004

THE TOWNS OF BETHANY, CHESHIRE, DURHAM, EASTON, FAIRFIELD,  
HAMDEN, MIDDLEFIELD, MILFORD, NORTH HAVEN, NORWALK, ORANGE,  
WALLINGFORD, WESTON, WESTPORT, WILTON, AND WOODBRIDGE

SIXTH SET OF INTERROGATORIES  
TO THE CONNECTICUT LIGHT AND POWER COMPANY  
AND THE UNITED ILLUMINATING COMPANY

The above-captioned towns (collectively, the "Towns"), each a party in the above-captioned proceeding, hereby request that The Connecticut Light & Power

Company ("CL&P") and The United Illuminating Company ("UI") answer the following interrogatories. CL&P and UI are sometimes hereinafter referred to collectively as the "Applicants."<sup>1</sup> The interrogatories are addressed to both of the Applicants; the Towns request that the Applicants provide responses to the interrogatories on or before April 19, 2004.

If there are objections to any of the interrogatories, or if providing responses to particular interrogatories (or portions thereof) would be unduly burdensome, the Towns request that the Applicants contact the undersigned as soon as possible.

In the event that any interrogatory requests specific data or information that has already been provided in this proceeding, the Applicants need only specifically identify where the responsive data or information is located in the record.

**I. DEFINITIONS**

A. As used in these interrogatories, "any" shall include "all," and "all" shall include "any," as needed to make the request inclusive and not exclusive.

B. As used in these interrogatories, "and" shall include "or," and "or" shall include "and," as needed to make the request inclusive and not exclusive. For example, both "and" and "or" mean "and/or."

C. As used in these interrogatories, "include" and "including" mean "including but not limited to."

D. As used in these interrogatories, "CL&P" means The Connecticut Light & Power Company and its present or former subsidiaries, affiliates, branches, divisions, principals, associated persons, control persons, directors, officers, employees, agents, trustees and beneficiaries. Each reference to CL&P shall be deemed to include any, all, or any grouping or subgrouping of persons

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<sup>1</sup> The undersigned represent solely the towns of Durham and Wallingford in this proceeding. The undersigned have been authorized to proffer the instant interrogatories on behalf of the Towns.

and entities named in the foregoing enumeration as needed to make the reference inclusive and not exclusive.

E. As used in these interrogatories, "UI" means The United Illuminating Company and its present or former subsidiaries, affiliates, branches, divisions, principals, associated persons, control persons, directors, officers, employees, agents, trustees and beneficiaries. Each reference to UI shall be deemed to include any, all, or any grouping or subgrouping of persons and entities named in the foregoing enumeration as needed to make the reference inclusive and not exclusive.

### **SIXTH SET OF TOWNS INTERROGATORIES TO CL&P/UI**

1. Reference the Applicants' response to CSC-28.
  - a. Please explain the bases for, and provide the analyses forming the basis for, the conclusion that while two circuits are specified for the underground segments of the proposed Project between East Devon and Singer Substations and Singer and Norwalk Substations, three circuits would be specified for any underground line between East Devon and Beseck Substations, and four circuits would be specified between the Beseck Substation and Oxbow Junction and Black Pond.
  - b. Please explain in detail, and provide any supporting documentation, the reasons why including two circuits (instead of three circuits) would not be adequate for an underground line between East Devon and Beseck.
  - c. Please explain in detail, and provide any supporting documentation, the reasons why including two circuits (instead of four circuits) would not be adequate for an underground line between Beseck and Oxbow or Beseck and Black Pond.
2. Reference the Applicants' response to CSC-28.
  - a. Quantify the levels of capacitance existing on Connecticut's transmission system and the amount by which this capacitance level is higher than it was in the past.
  - b. Provide the data which forms the basis for the statement that the level of capacitance on Connecticut's transmission system is "higher than that of other electric utilities in the region."
  - c. Quantify the amounts by which undergrounding of each of the following segments would increase the system capacitance: the line segment between Oxbow Junction and Beseck, the line segment between Black Pond and Beseck and the line segment between Beseck and East Devon.

3. Reference the December 31, 2003 PowerGEM “Southwest Connecticut Transmission, East Shore to Norwalk 345 KV OH/UG Alternative,” included as an Attachment to the January 8, 2004 Appendum #1 to the Supplemental Filing. At page 5 of this report, PowerGEM listed six bulleted changes that were made to the Middletown to Norwalk base case “to reconfigure the system appropriately to simulate the “East Shore 27-OH/UG configuration.”
  - a. Please describe in detail the basis for modeling each listed change from the base as part of the East Shore configuration and provide copies of any analyses or other documents that formed the basis for that change. Please also explain why each such change from the base case is necessary to appropriately model a potential East Shore route or configuration.
  - b. Provide the documentation in which the referenced “instructions from UI” or any other instructions from the Applicants were provided to PowerGEM.
  - c. Detail the reconfiguring of the East Shore substation that was done to increase the rating of the East Shore to Scovill Rock 345 kV line.
4. Please explain whether the Applicants’ proposed East Shore route includes each of the following elements of the proposed Middletown to Norwalk Project. If the answer is no, please explain in detail why not:
  - a. The proposed 345-kV line from Scovill Rock Switching Station to Chestnut Junction.
  - b. The proposed 345-kV line from Oxbow Junction to the proposed Beseck Substation.
  - c. The proposed 345-kV line from Black Pond Junction to the proposed Beseck substation.
  - d. The proposed Beseck Substation. Please note that if a more limited substation is included for Beseck, please detail all of the differences between that more limited substation and the substation at Beseck that would be included as part of the proposed Middletown to Norwalk Project.
5. Specify, and quantify where applicable, the criteria that GE uses when performing harmonic and switching transient analyses to determine whether a configuration being examined is adequate and should be recommended. Please also provide the GE documents which set out these criteria.
6. Reference Addendum #2 to the Supplemental Filing, at pages 2 and 3.
  - a. Explain the current status of the investigation of whether the 387 line transmission structures could support conductors with a

capacity larger than 2-954 ACSR, and if so, how that would affect the thermal load flow results. Please also state when these analyses will be completed.

- b. Please provide the analyses, reports, workpapers and source documents for the investigation of whether the 387 line transmission structures could support conductors with a capacity larger than 2-954 ACSR and if so, how that would affect the thermal load flow results.
  - c. Provide the documentation in which the ISO-NE SCWG informed the Companies that any thermal analysis of the East Shore Alternative must include generation dispatches that model the unavailability of the New Haven Harbor Generating Station and/or New York transfer analyses in accordance with NEPOOL standards and procedures.
  - d. Provide the NEPOOL standards and procedures which mandate that any thermal analysis of the East Shore Alternative must include generation dispatches that model the unavailability of the New Haven Harbor Generating Station and/or New York transfer analyses.
7. Reference the ISO-NE Southwest Connecticut Study Group report that was provided in Addendum #3 to the Supplemental Filing.
- a. Please state whether the modeling of the East Shore Alternative performed for the ISO-NE Study Group also reflected the system changes described at page 5 of the December 31, 2003 PowerGEM Report attached to Addendum #1 to the Supplemental Filing.
  - b. In particular, please explain whether the rating of the East Shore to Scovill Rock 345 kV line was increased in this modeling the reflect the reconfiguring of the East Shore substation and the removal of the 345/115 kV autotransformers from the 387 line path. If the answer is no, please explain why not.

Respectfully submitted,

THE TOWNS OF BETHANY,  
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FAIRFIELD, HAMDEN,  
MIDDLEFIELD, MILFORD,  
NORTH HAVEN, NORWALK,  
ORANGE, WALLINGFORD,  
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AND WOODBRIDGE

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## Certification

I hereby certify that a copy of the foregoing has been mailed, e-mailed and/or hand-delivered to all known parties and intervenors of record this 2nd day of April, 2004.

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